

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 22-CR-20114-KMW**

UNITED STATES OF AMERICA,

v.

CARLOS RAMON POLIT FAGGIONI,

Defendant.

\_\_\_\_\_ /

**UNOPPOSED MOTION FOR LEAVE TO FILE SUR REPLY  
TO DEFENDANT’S OBJECTIONS TO REPORT AND  
RECOMMENDATION ON MOTIONS TO DISMISS INDICTMENT**

The United States of America, by and through its undersigned attorneys, hereby seeks leave to file a limited sur reply to an argument about the government’s position in *United States v. Chi*, which was made by defendant Carlos Ramon Polit Faggioni in his reply to his objections to United States Magistrate Judge’s Report and Recommendation (“R&R”). [DE 106]. The defendant consents to this motion.

In the event the Court grants the government leave to file, the sur reply is attached as Exhibit 1. Attached as Exhibit 2 is the government’s response memorandum in *United States v. Chi*.

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

GLENN S. LEON  
CHIEF, FRAUD SECTION  
Criminal Division  
U.S. Department of Justice

By: /s Michael N. Berger

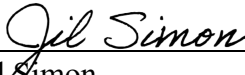
By: /s/ Jil Simon

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 25, 2023, I electronically filed the foregoing with the Clerk of the Court using CM/ECF.

  
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Jil Simon  
Trial Attorney